

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

John Kelley, et al.,

Plaintiffs,

v.

Xavier Becerra, et al.,

Defendants.

Case No. 4:20-cv-00283-O

SECOND DECLARATION OF ZACH MAXWELL

I, Zach Maxwell, declare as follows:

1. My name is Zach Maxwell. I am over 21 years old and fully competent to make this declaration.

2. I have personal knowledge of each of the facts stated in this declaration, and everything stated in this declaration is true and correct.

3. I am a plaintiff in this lawsuit, and I submit this declaration in support of the plaintiffs' supplemental motion for summary judgment.

4. I am responsible for purchasing health insurance for myself and my family.

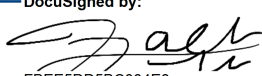
5. My wife and I have not carried health insurance since January of 2021, when I left my previous job to start my own business. We have been shopping for health insurance ever since but have not yet purchased it.

6. We still intend and want to purchase health insurance but we currently do not have it because the available plans are either too expensive or require us to pay for compulsory coverage mandates that violate our religious beliefs (or both). We have a family doctor in town that we visit who accepts cash, although it has been expensive to pay out of pocket for each doctor visit, and we recently paid cash for a midwife and

a home birth when Ashley gave birth to our fourth child. We would love to purchase affordable health insurance that excludes compulsory coverage of care that violates our religious beliefs, and we would strongly prefer that to our current situation.

7. Although I cannot guarantee that I would once again purchase health insurance in the absence of the preventive-care coverage mandates, I would seriously consider it, and I would carefully weigh the pros and cons before deciding what is best for my family.

This concludes my sworn statement. I declare under penalty of perjury that the foregoing is true and correct.

DocuSigned by:

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DECLARANT